8.0 ALTERNATIVES TO THE PROPOSED PROJECT

CEQA requires the consideration of alternative development scenarios and the analysis of impacts associated with the alternatives. Through comparison of these alternatives to the proposed project, the advantages of each can be weighed and analyzed. Section 15126.6(a) of the CEQA Guidelines requires that an EIR, "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

Three alternatives are examined in greater detail. Table 8-1 provides a summary of the alternatives analysis.

TABLE 8-1
Comparison of Project Alternatives Impacts
To Proposed Project Impacts

Impact Category	1. No Project Alternative[1]	2. Reduced Casino Alternative	3. Industrial Development Alternative
Land Use	Similar	Similar	Similar
Aesthetics/Visual Quality	N/A	N/A	N/A
Transportation/Circulation	Less	Less	Less
Air Quality	Less	Less/greater[2]	Less/greater[2]
Noise	Less	Similar	Similar
Biological Resources	Similar	Similar	Similar
Cultural Resources	Similar	Similar	Similar
Hydrology and Water Quality	Similar	Similar	Similar
Hazardous Materials/Public Safety	Similar	Similar	Similar
Public Services	Similar	Similar	Similar
Utilities and Service Systems	Similar	Similar	Similar
Geology/Soils	Similar	Similar	Similar

Notes: N/A = No significant impact identified associated with the proposed project.

[1] There would be no new impacts if the site is left as fallow agricultural land.

[2] During the construction, painting, and paving activities in 2017, the alternative would emit more ROG, NOx, CO, total PM10, total PM2.5, and substantially more CO2.

Source: BRG Consulting, Inc., 2008

8.1 Alternatives Considered but Rejected

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: 1) failure to meet most of the project objectives; 2) infeasibility; or 3) inability to avoid significant

environmental impacts (CEQA Guidelines §15126.6[c]). A detailed list of project objectives is included in Chapter 3.0. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans and regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (CEQA Guidelines §15126.6[f][1]).

Based on these parameters, two project alternatives were considered but rejected without detailed analysis as discussed below:

1. **Alternative Site Location.** With respect to location, analysis was conducted and it was determined that there is a significant demand for a Casino to be located in closer proximity to the international border than current casino's provide. Currently, people from the Imperial Valley and the individuals crossing the border travel to either San Diego County or Arizona for casino gaming. In 2005 the City of Calexico held a special election of the residents to determine if a casino would be an interest of the community and a casino use was approved. Therefore, planning and negotiations were made to find a project site. Based on this process the proposed project site was identified and determined to be the best location for the project. In addition, relocating the casino project to any other site within the City of Calexico would likely result in similar environmental impacts as the proposed project such as traffic and air quality. Therefore, the an alternative site location alternative of the project was considered but rejected without a detailed analysis.

2. **Calexico International Center.** The Calexico International Center project was approved in 2001 (Calexico International Center Final EIR SCH No. 99061020). This project was envisioned as a master-planned, mixed-use development. At the time the project was proposed, the project site was located within the City's Sphere of Influence but was not included in the City's incorporated boundaries. As approved, the project would allow for the development of hotel, restaurant, commercial, recreational vehicle park, residential uses, office uses, light industrial/manufacturing and recreational related uses. This alternative is rejected from further consideration. This alternative would not meet one of the primary objectives of the proposed project, to construct and operate a casino and supporting uses. Also, although approved over seven years ago, this development alternative was never constructed as the uses have since been determined to be both inappropriate (e.g. residential uses) and not viable.

8.2 No Project Alternative

CEQA Guidelines §15126.6(d) requires that an EIR address the No Project Alternative. According to Guideline §15126.6(e), "the specific alternative of 'no project' shall also be evaluated along with its impact. The 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."

The No Project Alternative assumes that the site would be developed and operated pursuant to the existing General Plan land use designations and existing zoning designations. The project site is in the jurisdiction of the City of Calexico and has been designated in the General Plan as Industrial (I), Medium Density Residential (MDR), High Density Residential (HDR), and Commercial Highway (CH) (Figure 4.1-1). The site is zoned Industrial Rail Served (IR) and Industrial (IND) (Figure 4.1-2). Please refer to Section 4.1.1.3 for detailed discussion of the applicable General Plan goals and policies and the intended uses described in the Zoning Ordinance. If the project were not to build out under its current zoning and designation, it would remain fallow agricultural land with no new impacts.

8.2.1 Land Use

Implementation of this alternative would result in similar impacts to those of the proposed project related to conformance with water conservation and recycling goals of the General Plan. Implementation of Mitigation Measures LU1 and LU2 would mitigate land use impacts to below a level of significance. In the event the project site remains fallow land, there would be no new impacts to land use.

8.2.2 Aesthetics/Visual Quality

Implementation of this alternative would not avoid or reduce a significant aesthetics/visual quality impact as no significant impact associated with the proposed project has been identified. In the event the project site remains fallow land, there would be no new impacts to aesthetics/visual quality.

8.2.3 Transportation/Circulation

Development of the project site consistent with the General Plan and Zoning Ordinance is contemplated in the City's General Plan EIR and improvements necessary to the roadway system should be included in the infrastructure planning. It is anticipated that land uses under the IR and IND zones generate less ADTs than the proposed project; therefore, development under this alternative has the potential to result in less roadway segment and intersection impacts than the proposed project. Without specific development details, it is not possible to determine the exact segments and intersections that would be significantly affected under the No Project Alternative. It is likely that impacts and mitigation requirements would be similar to those calculated for the proposed project, though they would be somewhat reduced because of the reduced traffic generation. In the event the project site remains fallow land, there would be no new impacts to transportation/circulation.

8.2.4 Air Quality

The proposed project would result in a short-term construction impact due to generation of fugitive dust, construction exhaust emissions, and ROGs above the ICAPCD's significance thresholds. The project would also result in a long-term air quality impact as a result of vehicular generated emissions. Implementation of Mitigation Measures AQ1 and AQ2 and compliance with ICPACD Regulation VIII, would reduce the short-term construction related air quality impact to a level less than significant, except for ROG emissions which is considered to be considered to a significant and unmitigable impact. Implementation of Mitigation Measures AQ3 and AQ4 would reduce the project's long-term operational air quality impact, as a result of vehicular generated emissions, to a less than significant impact.

In addition, the implementation of the proposed project will result in a significant impact to GHG emissions. With the implementation of Mitigation Measure AQ6, the impact to related to GHG emissions would be reduced to the extent feasible; however, a cumulatively significant and unmitigable impact would remain.

As with the proposed project, implementation of this alternative would result in short-term air pollutant emissions associated with construction and long-term air pollutant emissions associated primarily with mobile emissions (motor vehicles). The project site is generally flat and would not require substantial grading under the proposed project or the No Project Alternative. Equipment utilized during the construction phase of the No Project Alternative is anticipated to be similar to the proposed project (Table 4.4-6). Therefore, it is anticipated that short-term air pollutant emissions associated with the proposed project and the No Project Alternative would be similar and significant. Mitigation Measures AQ1 and AQ2 would also reduce impacts of the No Project Alternative to below a level of significance. ROG impacts would remain significant under the No Project Alternative.

Development of the project site consistent with the General Plan and Zoning Ordinance is contemplated in the City's General Plan EIR and improvements necessary to the roadway system should be included in the infrastructure planning. It is anticipated that land uses under the IR and IND zones generate less ADTs than the proposed project, resulting in less pollutant emissions that can contribute to exceedance of adopted Imperial County Air Pollution Control District (ICAPCD) operation significance thresholds, CO hotspots, and increases in GHG. Therefore, development under the No Project Alternative has the potential to result in less long-term air quality impact than the proposed project. Mitigation Measures AQ3 and AQ4 would reduce operational impacts of the No Project Alternative. Mitigation Measure AQ5 would reduce cumulative GHG impacts, but not to a level less than significant. In the event the project site remains fallow land, there would be no new impacts to air quality.

8.2.5 Noise

The proposed project would result in a significant exterior noise impact if outdoor features are proposed at locations on the project site that are adjacent to Scaroni Road and SR-111. As with the proposed project, under the No Project Alternative, traffic noise from SR-111 would dominate the noise environment surrounding the project site. The portion of the project site nearest SR-111 is zoned IND and is not considered a noise sensitive use. Although, if any outdoor feature is proposed as part of the project, within 50 feet from the centerline of SR-111, a significant impact associated with exterior noise will occur. Implementation of the No Project Alternative would result in a somewhat reduced impact as the proposed project because industrial uses are generally less noise sensitive than commercial uses. Mitigation Measures N1 and N2 related to the siting of outdoor uses to reduce noise exposure would also apply to the No Project Alternative. In the event a hotel use was developed under the No Project Alternative, Mitigation Measure N3 would reduce interior noise impacts to below a level of significance. In the event the project site remains fallow land, there would be no new impacts related to noise.

8.2.6 Biological Resources

The proposed project would result in significant direct and indirect impacts to three sensitive avian species; 1) western burrowing owl, 2) yellow warbler, and 3) mountain plover. Direct impacts would be caused by

clearing of suitable habitat for the burrowing owl. Indirect impacts to off-site western burrowing owls would be caused by increased light, traffic and noise associated with implementation of the proposed project. Direct impacts to the yellow warbler and mountain plover would include activities that result in take as defined by the Migratory Bird Treaty Act (most likely any vegetation removal and grading during breeding season). Implementation of Mitigation Measures B1 through B5 would reduce the significant impacts to a level less than significant.

At this time, it is unknown if sensitive biological resources would be impacted by a project that is consistent with the project site's General Plan and Zoning Ordinance. As under the proposed project, it is conservative to assume that the majority of the project site would be proposed for development, consistent with the General Plan and Zoning Ordinance designations. Therefore, it is anticipated that impacts to biological resources would be similar to the proposed project. Mitigation Measures B1 through B5, required for the proposed project, would also mitigate impacts for the No Project Alternative. In the event the project site remains fallow land, there would be no new impacts to biological resources.

8.2.7 Cultural Resources

Implementation of the proposed project would result in potentially significant impacts to cultural and paleontological resources because excavation for utilities and buildings would be required. Under the No Project Alternative, similar excavation would be required, potentially resulting in similarly significant impacts to cultural and paleontological resources. Implementation of Mitigation Measure CR1 and CR2 required for the proposed project would mitigate cultural and paleontological resource impacts associated with the No Project Alternative. In the event the project site remains fallow land, there would be no new impacts to cultural resources.

8.2.8 Hydrology and Water Quality

The proposed project would result in a violation of water quality standards in local surface waters through sedimentation/siltation and discharges from construction related activities. In addition, the proposed project would result in an increased amount of impervious surfaces on the project site, which creates the potential for runoff during a storm event to transport pollutants to local surface waters. The proposed project would result in a significant long-term impact to surface water quality. Mitigation Measure HWQ1 will reduce these water quality impacts to a level less than significant.

At this time, it is unknown if development of the project site consistent with the project site's General Plan and Zoning Ordinance would result in significant short-term and long-term water quality impacts. However, as under the proposed project, it is conservative to assume that the majority of the project site would be proposed for development, consistent with the General Plan and Zoning Ordinance designations. Therefore, it is anticipated that short-term and long-term water quality impacts would be similar to the proposed project. Mitigation Measure HWQ1 would also reduce impacts of the No Project Alternative to a level less than significant. In the event the project site remains fallow land, there would be no new impacts to hydrology and water quality.

8.2.9 Hazardous Materials/Public Safety

The proposed project would result in significant impacts to: soil contamination related to historic agricultural use of the project site; dewatering due to high potentially contaminated groundwater on the project site; and public safety related to the use and transport of chlorine by the Heber Geothermal Power Plant. Development of the project site under the No Project Alternative would result in a similarly significant impact to hazardous materials and public safety because of the potential for dewatering of contaminated groundwater and a potential release of chlorine associated with the HGC plant. Both the proposed project and development under this alternative would be required to implement Mitigation Measures HM1 and HM2 to reduce potential impacts related to dewatering and transport of chlorine to below a level of significance. In the event the project site remains fallow land, there would be no new impacts to hazardous material/public safety.

8.2.10 Public Services

Implementation of the proposed project would result in significant impacts to police and fire services, schools, libraries and administrative services. However, with implementation of Mitigation Measures PS1, PS2, and PS3 would reduce impacts to public services to below a level of significance.

Implementation of the No Project Alternative has the potential to result in a similar level of project-related impacts to public services as the proposed project. Under the No Project Alternative, there would be no money paid from the MOU between the Tribe and City, because there would be no casino. Nevertheless, payment of fees identified would reduce significant impacts of the No Project Alternative to below a level of significance. In the event the project site remains fallow land, there would be no new impacts to public services.

8.2.11 Utilities and Service Systems

The proposed project would result in a significant impact to water and wastewater services. However, with the implementation of Mitigation Measures PU1, and PU2 and construction of the appropriate infrastructure needed to service the project, this impact would be reduced to a level less than significant.

The proposed project would result in a significant impact to electricity services. The proposed project would result in an increase of electrical consumption and would require the construction of a new substation to service the project site. Implementation of Mitigation Measure PU3 will reduce this impact to a level less than significant.

It is anticipated that development under the No Project Alternative would also result in the need for additional water service, wastewater service, and electricity, including, but not limited to the construction of new infrastructure. The potential impact to utilities under the No Project Alternative is expected to be significant, similar to the impacts of the proposed project. The utilities and service systems mitigations required of the proposed project, PU1, PU2, and PU3, would also be required of the No Project Alternative. In the event the project site remains fallow land, there would be no new impacts to utilities and service systems.

8.2.12 Geology/Soils

The proposed project would result in significant impacts related to liquefaction, unstable soils, expansive soils, and soil erosion. Implementation of Mitigation Measure GS1 will reduce this impact to a level less than significant. Development of structures under the No Project Alternative would have a similar potential to result in impacts related to liquefaction, unstable soils, expansive soils, and soil erosion. Implementation of Mitigation Measure GS1 will reduce geology impact of the No Project Alternative to a level less than significant. In the event the project site remains fallow land, there would be no new impacts to geology/soils.

8.2.13 Summary of Impacts

This alternative is considered environmentally similar to the proposed project, as it would result in similar impacts related to land use, noise, biological resources, cultural resources, hydrology and water quality, hazardous materials/public safety, utilities and service systems, and geology/soils. Implementation of this alternative is anticipated to result in less traffic impacts and related air quality impacts, because implementation of this alternative would result in less ADT's and an associated reduction in carbon monoxide and other vehicular exhausts.

8.3 Reduced Casino Alternative

The Reduce Casino Alternative proposes to construct a 75,000 square foot gaming area with associated retail, restaurants, and hotel, with additional non-gaming phases of the proposed project and densities to remain the same as detailed under the proposed project. The casino space includes a 75,000 square foot gaming facility and internal casino related assembly space, retail and restaurant services, as well as a 200-room hotel. In terms of the casino, this represents a reduction of 18,800 square feet. Under the proposed project, the casino is proposed to be 93,880 square feet in size. This alternative would reduce the average daily trips generated by the proposed project.

Phase 1 of development considers the near term development of approximately 356,000 square feet of retail space (not part of the casino facility), and approximately 100,000 square feet of quality restaurant use (not part of the casino facility). The total project under the Reduced Casino Alternative includes the following densities:

- Casino - 75,000 square feet
- Casino Hotel - 200 rooms
- Hotel - 200 rooms
- Retail - 411,000 square feet
- Restaurant with Drive Through - 10,000 square feet
- Quality Restaurant - 100,000 square feet
- Office - 395,000 square feet
- Office Tech - 340,000 square feet

8.3.1 Land Use

Implementation of the Reduced Casino Alternative would result in similarly significant impacts to those of the proposed project related to conformance with water conservation and recycling goals of the General Plan. Implementation of Mitigation Measures LU1 and LU2 would mitigate land use impacts to below a level of significance.

8.3.2 Aesthetics/Visual Quality

Implementation of this alternative would not avoid or reduce a significant aesthetics/visual quality impact as no significant impact associated with the proposed project has been identified.

8.3.3 Transportation/Circulation

Information contained in this section is summarized from the *Traffic Study for Calexico-SR111 (Mixed Use Development in the Calexico Area of Imperial County*, prepared by Darnell and Associates (February 5, 2008). The traffic study is provided in Technical Appendices - Volume II of II, Appendix B of this EIR. All tables and figures referenced in this section are included in Technical Appendices - Volume II of II, Appendix B of the EIR.

8.3.3.1 Trip Generation/Distribution

The trip generation potential for the project is based on daily and peak hour trip generation rates obtained from the *(Not So) Brief Guide of Traffic Generators for the San Diego Region* published by the San Diego Association of Governments (SANDAG) in April 2002. Utilizing the SANDAG rates and the characteristics of the proposed project, estimates of daily and peak hour traffic volumes generated by the project can be calculated.

Under the existing conditions scenario, the reduced casino is analyzed as a separate phase. Additional analysis for the existing conditions assumes the reduced casino plus phase 1. Under the near term cumulative conditions (year 2015), analysis considers the reduced casino as a separate phase. Additional analysis was conducted with the total project (all phases) to demonstrate the worst-case development scenario (full buildout of the project by year 2015).

Table 36 of the traffic study summarizes the trip generation rates and volumes for the proposed project for the Casino with hotel usage, which demonstrates the total volume of traffic to occur on site. Table 37 summarizes the trip generation potential for the reduced casino phase plus phase 1 (total project) and shows the total traffic, which is expected to occur on site. Table 38 summarizes the total project trip generation (all phases).

Since the proposed project is mixed-use, a portion of the traffic generated by the project can be divided into internal and external trips. An internal trips is a relationship between uses where a user may visit a restaurant and retail shop while staying at the hotel. The internal trip component helps reduce the amount of "double counting" of traffic, which would occur if all land uses were considered as separate entities with no relationship to each other.

The resulting "net new" project trips (external trips on the circulation system roadways) are summarized in Table 39. External traffic reductions for each land use are shown on Table 39. The total new trips added to the external roadway network under buildout conditions with the Reduced Casino Alternative is 57,397 daily ADT, 3,268 AM peak hour trips, and 5,943 PM peak hour trips.

8.3.3.2 Trip Distribution/Trip Assignment

A. Near-Term Trip Distribution/Trip Assignment

The traffic generated by the reduced Casino-only (with hotel) portion project was assigned to the roadways and intersections based on the established trip distribution percentages. The project related daily traffic volumes for the reduced Casino phase is shown on Figure 46. The intersection peak hour volumes for the Casino phase are shown on Figure 46 for the northern study area and Figure 48 for the southern study area.

The project related daily traffic volumes for the reduced Casino phase plus Phase 1 are shown on Figure 49. The intersection peak hour volumes for the Casino phase plus Phase 1 are shown on Figure 50 for the northern study area and Figure 51 for the southern study area.

With buildout of the Reduced Casino Alternative (assumed for the year 2015 condition), all project phases traffic is assigned to the roadway network as shown on Figure 52 (for daily traffic), Figure 53 (intersections on the north) and Figure 54 (intersections on the south).

B. Year 2035 Trip Distribution/Trip Assignment

Due to the changes in the roadway network, the project traffic distribution would change under future year 2035 conditions. The same assumptions for the distribution of the "proposed project" was used for the Reduced Casino Alternative (refer to Figure 5-17 of Chapter 5.0 of this EIR).

Figure 55 illustrates the future project daily traffic volumes on the future roadway network. Figure 56 depicts the peak hourly future intersection traffic volumes for the total project (with reduced casino).

At buildout this alternative will generate approximately 75,308 average daily trips (ADT), 3,883 AM peak hour trips, and 7,082 PM peak hour trips. A portion of the trips would be captured internally or be commercial pass-by trips resulting in a total new trips of 59,285 ADT, 3,286 AM peak hour trips, and 6,071 PM peak hour trips being added to the external roadway network.

8.3.3.3 Near-Term Impacts (Reduced Casino Only)

The impacts below summarize the reduced casino condition on the existing roadway configuration with existing base traffic conditions. All tables and figures referenced in this section are included in Technical Appendices - Volume II of II, Appendix B of the EIR.

A. Existing Plus Project (Reduced Casino Only) Conditions

The reduced Casino project traffic, which was assumed to occur in the near term, was added to the existing traffic volumes. The daily traffic volumes for the existing plus reduced Casino condition are shown on Figure 57. The intersection peak hour volumes for this condition are shown on Figure 58 for the northerly study area and Figure 59 for the southerly study area.

Existing (With Reduced Casino Only) Roadway Segments

The roadway segments were analyzed with the project traffic (reduced Casino only) added to existing traffic volumes. The roadway segments daily levels of service are summarized in Table 40. As shown on Table 40, with addition of the reduced Casino Only traffic, the following segments would have a significant impact:

- Dogwood Road: north of I-8 (cumulative)
- SR-111: south of SR-98 (cumulative)
- Cole Road: Enterprise to SR-111 (cumulative)

Mitigation Measures to reduce these cumulative impacts to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR. Table 57 summarizes the level of service results with mitigation in place for this scenario. As shown in Table 57 all roadway segments operate acceptably with identified mitigation.

Existing (With Reduced Casino Only) Intersection Operation

Intersection operation for the existing plus project condition is summarized on Table 41. As shown on Table 10, with addition of the Reduced Casino Only traffic, the following intersections would have a significant impact:

- I-8 Westbound/Dogwood Road (cumulative)
- I-8 Eastbound/Dogwood Road (cumulative)
- Dogwood Road/Heber Road (cumulative)
- Cole Road/Scaroni Avenue (cumulative)
- SR-111/Cole Road (cumulative)
- SR-98/SR-111 (cumulative)

Mitigation Measures to reduce these cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR. Table 58 summarizes the level of service results with mitigation in place for this scenario. As shown in Table 58 all intersections operate acceptably with identified mitigation.

Existing (With Reduced Casino Only) - (ILV) Intersection Operation

Caltrans ILV analysis for the existing plus project condition is summarized on Table 42. As shown on Table 42, all interchanges operate at less than 1,500 ILV, which is considered acceptable.

B. Existing Plus Project (Reduced Casino+Phase 1) Conditions

The reduced Casino and Phase 1 project traffic was added to the existing traffic volumes. The daily traffic volumes for the existing plus project (reduced Casino+Phase 1) condition are shown on Figure 60. The intersection peak hour volumes for this condition are shown on Figure 61 for the northerly study area and Figure 62 for the southerly study area.

Existing (With Reduced Casino+Phase 1) Roadway Segments

The roadway segments were analyzed with the project traffic (Reduced Casino+Phase 1) added to existing traffic volumes. The roadway segments daily levels of service are summarized in Table 43. As shown on Table 43, with addition of the Reduced Casino+Phase 1 traffic, the following segments would have a significant impact:

- Dogwood Road: north of I-8 (cumulative)
- Dogwood Road: I-8 to McCabe (direct)
- Dogwood Road: McCabe to Heber (direct)
- Dogwood Road: SR-86 (Heber) to Jasper (direct)
- SR-111: south of SR-98 (cumulative)
- Jasper Road: Scaroni to SR-111 (direct)
- Cole Road: Enterprise to SR-111 (cumulative)

Mitigation Measures to reduce these direct and cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR. Table 59 summarizes the level of service results with mitigation in place for this scenario. As shown in Table 59 all roadway segments operate acceptably with identified mitigation.

Existing (With Reduced Casino+Phase 1) Intersection Operation

Intersection operation for the existing plus project condition is summarized on Table 44. As shown on Table 44, with addition of the Reduced Casino+Phase 1 traffic, the following intersections would have a significant impact:

- I-8 Westbound/Dogwood Road (cumulative)
- I-8 Eastbound/Dogwood Road (cumulative)
- Dogwood/McCabe (direct)
- Dogwood Road/Heber Road (cumulative)
- Dogwood/Willoughby (realign to Jasper) (direct)
- Jasper Road/Scaroni Road (direct)
- Jasper Road/SR-111 (direct)
- Dogwood Road/Cole Road (direct)
- Cole Road/Scaroni Avenue (cumulative)

- SR-111/Cole Road (cumulative)
- SR-98/SR-111 (cumulative)

Mitigation Measures to reduce these direct and cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR. Table 60 summarizes the level of service results with mitigation in place for this scenario. As shown in Table 60 all intersections operate acceptably with identified mitigation.

Existing (With Reduced Casino+Phase 1) - (ILV) Intersection Operation

Caltrans ILV analysis for the existing plus project condition is summarized on Table 45. As shown on Table 45, with addition of the Reduced Casino+Phase 1 traffic, the following intersections would have a significant impact based on Caltrans criteria:

- SR-111/Jasper Road
- SR-111/Cole Road

Mitigation Measures to reduce these cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR.

8.3.3.4 Year 2015 Impacts (Reduced Casino)

The following analysis of the Year 2015 condition for the reduced casino alternative assumes the same base condition and configurations as reported previously in this report for the "proposed project" including the same intensity of cumulative projects' traffic contributions.

A. Year 2015 With Project Conditions

The Year 2015 condition was analyzed using two separate project scenarios. The initial assessment is based on development of the reduced casino facility (with hotel). The second analysis assumes buildout of the entire project (all phases with reduced hotel) set upon the year 2015 base condition.

Reduced Casino Alternative traffic was added to the base Year 2015. Figure 63 illustrates the Year 2015 plus project (reduced casino) daily traffic volumes. Figure 64 shows the intersection volumes for this condition on the northern study area, and Figure 65 for the southern study area.

Total project traffic (all phases) was added to the base Year 2015. Figure 66 illustrates the Year 2015 plus total project daily traffic volumes. Figure 67 shows the intersection volumes for this condition on the northern study area, and Figure 68 for the southern study area.

Year 2015 (With Reduced Casino Only) Roadway Segment Operation

The roadway segments were analyzed under Year 2015 conditions with and without the Reduced Casino Alternative. The roadway segments daily levels of service are summarized in Table 46. As shown in Table 46, no additional impacts are identified with development of the Casino phase beyond those identified for the proposed project.

Year 2015 (With Reduced Casino Only) Intersection Operation

Intersection operation for the Year 2015 condition is summarized in Table 47. For the year 2015, diamond interchanges are assumed along SR-111 at Heber Road, Jasper Road, and Cole Road, as a result of cumulative traffic volumes. With addition of the Reduced Casino traffic, the following intersections would have a significant impact:

- Jasper/Rockwood (cumulative)
- Cole/Yourman (cumulative)
- SR-98/SR-111 (cumulative)

Mitigation Measures to reduce these cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR. Table 61 summarizes the level of service results with mitigation in place for this scenario. As shown in Table 61 all intersections operate acceptably with identified mitigation.

Year 2015 (With Reduced Casino Only) Caltrans (ILV) Intersection Operation

Caltrans intersection operation methodology on SR-111 interchange locations is summarized on Table 48. As shown on Table 48, the following intersection exceeds Caltrans capacity for the Year 2015 condition and would result in a significant impact:

- State Route-111/State Route-98 - (greater than 1,500 conflicting vehicles)

Mitigation Measures to reduce these cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR.

Year 2015 (With Total Project+Reduced Casino) Roadway Segment Operation

The roadway segments were analyzed under Year 2015 conditions with and without the total project (all phases with reduced casino). The roadway segments daily levels of service are summarized in Table 49. As shown in Table 49, with addition of the Total Project Reduced Casino traffic, the following segments would have a significant impact for Year 2015:

- Dogwood: McCabe to SR-86 (cumulative)
- Dogwood: SR-86 to Jasper (cumulative)
- Jasper Road: Scaroni to SR-111 (cumulative)
- Jasper Road: SR-111 to Rockwood (cumulative)

Mitigation Measures to reduce these cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR. Table 62 summarizes the level of service results with mitigation in place for this scenario. As shown in Table 62 all roadway segments operate acceptably with identified mitigation.

Year 2015 (With Total Project+Reduced Casino) Intersection Operation

Intersection operation for the Year 2015 condition with the total project is summarized in Table 50. With addition of the Total Project Reduced Casino traffic, the following intersections would have a significant impact for Year 2015:

- Jasper Road/Scaroni Road (cumulative)
- State Route 111 South/Jasper Road (cumulative)
- State Route 111 North/Jasper Road (cumulative)
- Jasper Road/Rockwood Avenue (cumulative)
- Cole Road/Scaroni Road (cumulative)
- Cole Road/Yourman (Rockwood) (cumulative)
- State Route-98/State Route-111 (cumulative)

Mitigation Measures to reduce these cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR. Table 63 summarizes the level of service results with mitigation in place for this scenario. As shown in Table 63 all intersections operate acceptably with identified mitigation.

Year 2015 (With Total Project+Reduced Casino) Caltrans (ILV) Intersection Operation

Caltrans intersection operation methodology on SR-111 interchange locations is summarized on Table 51. As shown on Table 51, with addition of the Total Project Reduced Casino traffic, the following intersections would have a significant impact for Year 2015:

- State Route-111 Northbound/Jasper Road (greater than 1,500 conflicting vehicles)
- State Route-111/State Route-98 - (greater than 1,500 conflicting vehicles)

Mitigation Measures to reduce these cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR.

8.3.3.5 Year 2035 Roadway Network

For the year 2035 daily traffic analysis, all base assumptions are the same for the "proposed project" scenario.

A. Year 2035 Plus Reduced Casino

Year 2035 Roadway Segments (With Reduced Casino)

The roadway segments were analyzed under Year 2035 conditions with and without the reduced casino project. The roadway segments daily levels of service are summarized in Table 52. As shown in Table 52, all roadway segments operate efficiently with General Plan Circulation Element improvements. However, The project is required to participate in fair-share contributions to roadway and intersection improvements based on their traffic volumes (fair share is calculated in subsequent sections) to construct off-site circulation element needs.

The Jasper Road corridor also requires a six-lane configuration from Dogwood to east of Bowker Road. The project will be required to participate in this ultimate mitigation based on their fair share.

Additionally, with construction of Sunset Road south to Cole Road, the project is responsible for their fair share of necessary improvements including potential bridge widening on Sunset, as well as the Scaroni Road crossing.

Year 2035 (With Industrial Project Only) Intersection Operation

No impact to Intersection operation for the Year 2035 condition with the Reduced Casino Alternative was identified. Therefore, a less than significant impact is identified for this issue area.

Year 2035 (With Industrial Project Only) Caltrans (ILV) Intersection Operation

No impact to Caltrans intersection operation is identified with the Reduced Casino Alternative during the Year 2035 conditions.

8.3.3.6 Reduced Casino Project Access

The project proposes three driveway access points on Jasper Road west of SR-111, which would also occur with the proposed project. The realignment of Scaroni Avenue to the west will form the most easterly access to the project. A second major access on Jasper Road is proposed west of the Scaroni Avenue alignment and is currently labeled "Sunset" on the project site plan. The third driveway to Jasper is located west of the future Sunset Road and is labeled Street "A" on the current site plan.

The project access at the realignment of Scaroni Avenue at Jasper Road is analyzed in the above impact sections for all project conditions. This intersection requires a traffic signal, with dual northbound left turn lanes, dual northbound right turn lanes, dual westbound left lanes and an exclusive eastbound right turn lane within Jasper Road (assuming Jasper Road with six through lanes).

Jasper Road/Street "A" - ultimately requires a traffic signal with a single egress lane and a westbound left turn lane.

Jasper Road/Sunset Road - assumes a traffic signal, two northbound lanes, dual westbound left lanes, an exclusive eastbound right turn lane within Jasper Road (as a 6-lane roadway).

Additionally, the project is required to construct Sunset Boulevard south to Cole Road, which will create an intersection, which ultimately requires a traffic signal, and an eastbound left turn lane. (Note: that the Sunset Road extension is not required with the Reduced Casino phase of the project.)

8.3.3.7 *Reduced Casino Alternative Access Operation*

A. Existing Plus Reduced Casino

Existing (With Reduced Casino Only) Access

Project access operation for the existing plus casino condition is shown on Table 53. For this condition, the Street "A", Sunset Boulevard, and Cole/Sunset intersections with Jasper Road can operate effectively with stop control on the minor leg (project side) with no additional turn lanes.

Existing (With Reduced Casino+Phase 1) Access

This condition assumes four-lanes on Jasper Road. Project access operation for the existing plus project (reduced casino plus phase 1) condition is shown on Table 54. For this condition, the Street "A", Sunset Boulevard, and Cole/Sunset intersections with Jasper Road can operate effectively with stop control on the minor leg (project side). Westbound left turn lanes are required on Jasper Road at both driveways. An eastbound left turn lane is required at Cole/Sunset.

B. Year 2015 Plus Reduced Casino Project Access

Year 2015 (With Reduced Casino Only) Access

Project access operation for the Year 2015 condition with reduced Casino only traffic is shown on Table 55. The Jasper Road driveways operate effectively with stop control on egress with four lanes on Jasper. The intersection of Cole/Sunset will require a traffic signal.

Year 2015 (With Total Project + Reduced Casino) Access

Project access operation for the Year 2015 condition with Casino only traffic is shown on Table 56. The Jasper Road driveways operate effectively with traffic signal control with four lanes on Jasper. The intersection of Cole/Sunset also requires a traffic signal. Left turn lanes in Jasper and Cole Road are required with two egress lanes (project side) at all driveways).

8.3.3.8 *Summary*

Development of this alternative during the initial phase (existing plus casino and existing plus casino plus phase 1) and cumulative phase (year 2015 plus casino and year 2015 plus total project) will generate less traffic than the proposed project. This alternative eliminates the direct impact the Jasper/SR-111 intersection, which is improved over the proposed project condition. All project scenarios generate significant traffic impacts; however this alternative provides a reduced level of significance as compared to the proposed project.

8.3.4 Air Quality

The proposed project would result in a short-term construction impact due to generation of fugitive dust, construction exhaust emissions, and ROGs above the ICAPCD's significance thresholds. The project would also result in a long-term air quality impact as a result of vehicular emissions. Implementation of Mitigation Measures AQ1 and AQ2 and compliance with ICPACD Regulation VIII, would reduce the short-term

construction related air quality impact to a level less than significant, except for ROG emissions which is considered to be a significant and unmitigable impact. Implementation of Mitigation Measures AQ3 and AQ4 would reduce the project's long-term operational air quality impact, to a less than significant impact.

In addition, the implementation of the proposed project will result in a significant impact to GHG emissions. With the implementation of Mitigation Measure AQ6, the impact to related to GHG emissions would be reduced to the extent feasible; however, a cumulatively significant and unmitigable impact would remain.

Information contained in this section is summarized from the *Air Quality Impact Analysis, 111 Calexico Place Project, Reduced Casino Alternative, Calexico California*, prepared by Giroux and Associates Environmental Consultants (September 2, 2008). The air quality study is provided in Technical Appendices - Volume II of II, Appendix C2 of this EIR. All tables and figures referenced in this section are included in Technical Appendices - Volume II of II, Appendix C2 of this EIR.

8.3.4.1 Construction Impacts (Short-Term)

A comparison of Table 4.4-7 in the EIR, which identifies the proposed project's pollutant emissions and Table 4 in Technical Appendices - Volume II of II, Appendix C2 in the EIR was conducted to identify the change in pollutant emissions between the proposed project and this alternative. During grading activities for the reduced casino and retail components of the project, the alternative would emit less total PM10, and less total PM2.5 than the proposed project. During the construction, painting, and paving activities for the reduced casino and retail components (Phases 1 and 2) of the project, the alternative would emit less ROG, NOx, CO, PM10, and CO2 than the proposed project.

During grading activities for the office/technology (Phases 3 and 4) components of this alternative and the proposed project would emit similar levels of pollutant emissions. During the construction, painting, and paving activities for the office/technology components, the alternative would emit more ROG, NOx, CO, total PM10, total PM2.5, and substantially more CO2. The proposed project would emit 7,229.9 pounds/day of CO2 and the alternative would emit 12,901.4-pounds/per day. The alternative would emit 5,671.5-pounds/per day more of CO2 during construction, painting, and paving construction activities.

During construction, the alternative neither eliminates a significant air quality impact nor does it result in a new air quality impact not already identified under the proposed project.

8.3.4.2 Operational Emissions

A comparison of Table 4.4-8 in the EIR, which identifies the proposed project's pollutant emissions and Table 5 in Technical Appendices - Volume II of II, Appendix C2 in the EIR was conducted to identify the change in pollutant emissions between the proposed project and this alternative. During operation of the casino, hotel, restaurant, and retail components of the project, the alternative would emit less ROG, NOx, CO, SOx, PM10, PM2.5, and CO2 than the proposed project. However, the reduced emission levels generated by the alternative would not eliminate an exceedance of any pollutant emission and the impact would remain significant.

During operation of the total project with the office use component of the project, the alternative would emit less ROG, NOx, CO, SOx, PM10, PM2.5, and CO2 than the proposed project. However, the emission levels generated by the alternative would not eliminate an exceedance of any pollutant emission and the impact would remain significant.

Under the proposed project, less than significant impacts have been identified for the following issues: microscale impact (CO "Hotspots") and Odor/Air Toxins (e.g., geothermal power plant and greenhouse gas emissions (GHG). With the exception of the construction, painting, and paving activities in 2017 (short-term impacts), this alternative would emit less pollutant emissions that would have the potential to contribute to microscale impacts and odor/air toxins. In particular, in the long-term, the alternative would generate less traffic, resulting in less pollutant emissions that can contribute to exceedance of adopted Imperial County Air Pollution Control District (ICAPCD) operation significance thresholds, CO hotspots, and increases in GHG. Implementation of Mitigation Measures AQ1 and AQ2 would reduce construction related impacts of the alternative, except ROG emissions, to a level less than significant. Implementation of Mitigation Measures AQ3 and AQ4 would reduce operational emissions to a level less than significant. Implementation of Mitigation Measure AQ5 would reduce GHG emissions, but such emissions would remain cumulatively significant.

8.3.5 Noise

Information contained in this section is summarized from the *Noise Impact Analysis, 111 Calexico Place Project, Reduced Casino Alternative, Calexico California*, prepared by Giroux and Associates Environmental Consultants (September 3, 2008). The noise is provided in Technical Appendices - Volume II of II, Appendix D2 of this EIR. All tables and figures referenced in this section are included in Technical Appendices - Volume II of II, Appendix D2 of this EIR.

8.3.5.1 Project-Related Vehicular Noise

Under the proposed project, project-related traffic would increase noise levels by +3 dB or more at the existing timeframe on twelve segments in the project vicinity. However, by 2015 and 2035, this impact is diminished as the project contribution to traffic is diluted by area growth. Under this alternative, project-related traffic would increase noise levels by +3 dB or more at seven segments (See Table 1, Technical Appendices - Volume II of II, Appendix D2). However, as with the proposed project, the only segment that remains significant in 2015 and 2035 is the Jasper Road segment between SR-111 and Scaroni Road, immediately adjacent to the project site. There are no proposed noise sensitive uses adjacent to this segment. As such, project related vehicular noise impacts are considered less than significant. Implementation of this alternative would result in a similar noise impact. The issue is considered a less than significant impact.

8.3.5.2 Project Exterior Noise

As with the proposed project, under this alternative a significant impact would occur if outdoor uses were proposed within 80 feet of the Scaroni Road centerline. In addition, as with the proposed project, under this alternative a significant impact would occur if outdoor uses associated with the restaurant and retail uses are sited adjacent to SR-111. Implementation of this alternative would result in a similar noise impact,

requiring implementation of Mitigation Measures N1 and N2 identified for the proposed project. In addition, proposed hotel rooms with common party walls may experience significant noise levels under both the proposed project and Reduced Casino Alternative. Mitigation Measure N3 will reduce such impacts to below a level of significance.

8.3.6 Biological Resources

As with the proposed project, under the Reduced Casino Alternative, it is conservative to assume that the majority of the project site would be developed. Therefore, it is anticipated that impacts to biological resources would be similar to the proposed project.

The proposed project would result in significant direct and indirect impacts to three sensitive avian species; 1) western burrowing owl, 2) yellow warbler, and 3) mountain plover. Direct impacts would be caused by clearing of suitable habitat for the burrowing owl. Indirect impacts to off-site western burrowing owls would be caused by increased light, traffic and noise associated with implementation of the proposed project. Direct impacts to the yellow warbler and mountain plover would include activities that result in take as defined b the Migratory Bird Treaty Act (most likely any vegetation removal and grading during breeding season). Implementation of Mitigation Measures B1 through B5 would reduce the significant impacts to a level less than significant.

Similar impacts would occur under the Reduced Casino Alternative. Implementation of Mitigation Measures B1 through B5 would reduce the significant biological resources impacts to a level less than significant.

8.3.7 Cultural Resources

Implementation of the proposed project would result in potentially significant impacts to cultural and paleontological resources because excavation for utilities and buildings would be required. Under the Reduced Casino Alternative, similar excavation would be required, potentially resulting in similarly significant impacts to cultural and paleontological resources. Implementation of Mitigation Measure CR1 and CR2 required for the proposed project would mitigate cultural and paleontological resource impacts associated with the Reduced Casino Alternative.

8.3.8 Hydrology and Water Quality

The proposed project would result in a violation of water quality standards in local surface waters through sedimentation/siltation and discharges from construction related activities. In addition, the proposed project would result in an increased amount of impervious surfaces on the project site, which creates the potential for runoff during a storm event to transport pollutants to local surface waters. The proposed project would result in a significant long-term impact to surface water quality. Mitigation Measure HWQ1 will reduce these water quality impacts to a level less than significant.

It is anticipated that short-term and long-term water quality impacts under the Reduced Casino Alternative would be similar to the proposed project. Mitigation Measure HWQ1 would also reduce impacts of the Reduced Casino Alternative to a level less than significant.

8.3.9 Hazardous Materials/Public Safety

The proposed project would result in significant impacts to: soil contamination related to historic agricultural use of the project site; dewatering due to high potentially contaminated groundwater on the project site; and public safety related to the use and transport of chlorine by the Heber Geothermal Power Plant. Development of the project site under the Reduced Casino Alternative would result in a similarly significant impact to hazardous materials and public safety because of the potential for dewatering of contaminated groundwater and a potential release of chlorine associated with the HGC plant. Both the proposed project and development under this alternative would be required to implement Mitigation Measures HM1 and HM2 to reduce potential impacts related to dewatering and chlorine to below a level of significance.

8.3.10 Public Services

Implementation of the proposed project would result in significant impacts to police and fire services, schools, libraries, and administrative services. Implementation of Mitigation Measures PS1, PS2, and PS3 would reduce impacts to public services to below a level of significance.

Implementation of the Reduced Casino Alternative has the potential to result in a similar level of project-related impacts to public services as the proposed project. Under this alternative, there would still be money paid from the MOU between the Tribe and City, but it may be reduced because the casino would be reduced. Payment of fees identified would reduce significant impacts of the Reduced Casino Alternative to below a level of significance.

8.3.11 Utilities and Service Systems

The proposed project would result in a significant impact to water and wastewater services. However, with the implementation of Mitigation Measures PU1, and PU2 and construction of the appropriate infrastructure needed to service the project, this impact would be reduced to a level less than significant.

The proposed project would result in a significant impact to electricity services. The proposed project would result in an increase of electrical consumption and would require the construction of a new substation to service the project site. Implementation of Mitigation Measure PU3 will reduce this impact to a level less than significant.

It is anticipated that development under the Reduced Casino Alternative would also result in the need for additional water service, wastewater service, and electricity, including, but not limited to the construction of new infrastructure. The potential impact to utilities and service systems under this alternative is expected to be significant, similar to the impacts of the proposed project. The utilities and service systems mitigations required of the proposed project, PU1, PU2, and PU3, would also be required of the Reduced Casino Alternative.

8.3.12 Geology/Soils

The proposed project would result in significant impacts related to liquefaction, unstable soils, expansive soils, and soil erosion. Implementation of Mitigation Measure GS1 will reduce this impact to a level less than

significant. Development of structures under the Reduced Casino Alternative would have a similar potential to result in impacts related to liquefaction, unstable soils, expansive soils, and soil erosion. Implementation of Mitigation Measure GS1 will reduce the geology/soils impact of this alternative to a level less than significant.

8.3.13 Summary of Impacts

This alternative is considered environmentally superior to the proposed project, as it would result in similar, though reduced, impacts related to air quality, noise, and traffic. Impacts to land use, cultural resources, biological resources, hydrology and water quality, hazardous materials/public safety, utilities and service systems, and geology/soils would be similar.

Traffic Summary: Development of this alternative during the initial phase (existing plus casino and existing plus casino plus phase 1) and cumulative phase (year 2015 plus casino and year 2015 plus total project) will generate less traffic than the proposed project. This alternative eliminates the direct impact the Jasper/SR-111 intersection, which is improved over the proposed project condition. All project scenarios generate significant traffic impacts; however this alternative provides a reduced level of significance as compared to the proposed project. Implementation of this alternative would result in less ADT's and an associated reduction in carbon monoxide.

8.4 Industrial Development Alternative

The Industrial Development Alternative proposes to construct a 615,000 square feet of industrial park to replace the office tech land use density as well as a portion of the office development identified as the proposed project. The total project under the Industrial Development Alternative includes the following densities:

- Casino – 93,880 square feet
- Casino Hotel - 200 rooms
- Hotel - 200 rooms
- Retail - 411,000 square feet
- Restaurant with Drive Through - 10,000 square feet
- Quality Restaurant - 100,000 square feet
- Office - 120,000 square feet
- Industrial Park - 615,000 square feet
-

8.4.1 Land Use

Implementation of the Industrial Development Alternative would result in similarly significant impacts to those of the proposed project related to conformance with water conservation and recycling goals of the General Plan. Implementation of Mitigation Measures LU1 and LU2 would mitigate land use impacts to below a level of significance.

8.4.2 Aesthetics/Visual Quality

Implementation of this alternative would not avoid or reduce a significant aesthetics/visual quality impact as no significant impact associated with the proposed project has been identified.

8.4.3 Transportation/Circulation

Information contained in this section is summarized from the *Traffic Study for Calexico-SR111 (Mixed Use Development in the Calexico Area of Imperial County*, prepared by Darnell and Associates (February 5, 2008). The traffic study is provided in Technical Appendices - Volume II of II, Appendix B of this EIR. All tables and figures referenced in this section are included in Technical Appendices - Volume II of II, Appendix B of the EIR.

Development of this alternative would occur during the final phases of the project and would not change the findings and conclusions of the proposed project for the existing plus casino, existing plus casino + phase 1, and year 2105 plus casino scenarios analyzed for the proposed project.

8.4.3.1 Trip Generation

The trip generation potential for this alternative is based on daily and peak hour trip generation rates obtained from the *(Not So) Brief Guide of Traffic Generators for the San Diego Region* published by the San Diego Association of Governments (SANDAG) in April 2002. Utilizing the SANDAG rates and the characteristics of the proposed project, estimates of daily and peak hour traffic volumes generated by the project can be calculated.

Table 64 summarizes the trip generation rates and volumes for this alternative. Since the proposed project is a mixed use project, a portion of the traffic generated by the project can be divided into internal and external trips. The resulting "net new" project trips (external trips on the circulation system roadways) are summarized in Table 65. The total new trips added to the external roadway network under project buildout conditions with industrial development is 53,265 daily ADT, 2,405 AM peak hour trips, and 5,294 PM peak hour trips.

8.4.3.2 Trip Distribution/Trip Assignment

A. Near-Term Trip Distribution/Trip Assignment

The trip distribution percentages were assumed to be the same as the "proposed project" (refer to Figure 4.3-7 in Section 4.3 of this EIR). The traffic generated by the industrial development project was assigned to the roadways and intersections based on these established trip distribution percentages. The project related daily traffic volumes for the industrial development project is shown on Figure 69. The intersection peak hour volumes for the industrial development project are shown on Figure 70 for the northern study area and Figure 71 for the southern study area.

B. Year 2035 Trip Distribution/Trip Assignment

Due to the changes in the roadway network, the project traffic distribution would change under future year 2035 conditions. The same assumptions for the distribution of the "proposed project" was used for the industrial development alternative (refer to Figure 5-17 of Chapter 5.0 of this EIR).

Figure 72 illustrates the future project daily traffic volumes on the future roadway network. Figure 73 depicts the peak hourly future intersection traffic volumes for the total project (industrial development).

This alternative was added to the Year 2015 base condition. Year 2015 plus industrial project daily traffic is shown in Figure 74. Peak hour intersection volumes for north intersections are shown on Figure 75 and Figure 76 for southern intersections.

8.4.3.3 Year 2015 Impacts

The impacts associated with this alternative are analyzed in the year 2015 scenario since this alternative only affects parts of the project that would be developed as part of Phase II. All previous phases of project development have the same findings and conclusions as the "proposed project."

Year 2015 (Casino+Phase1+Industrial Project) Roadway Segment Operation

The roadway segments were analyzed under Year 2015 conditions with and without this alternative. The roadway segments daily levels of service are summarized in Table 66. As shown in Table 66, with addition of the Total Project+Industrial Project traffic, the following segments would have a significant impact for Year 2015:

- Dogwood: McCabe to SR-86 (cumulative)
- Dogwood: SR-86 to Jasper (cumulative)
- Jasper Road: Scaroni to SR-111 (cumulative)

Mitigation Measures to reduce these cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR. Table 71 summarizes the level of service results with mitigation in place for this scenario. As shown in Table 71 all roadway segments operate acceptably with the identified mitigation.

Year 2015 (With Total Project+Industrial Project) Intersection Operation

Intersection operation for the Year 2015 condition with the total project is summarized in Table 67. With addition of the Total Project+Industrial Project traffic, the following intersections would have a significant impact for Year 2015:

- Jasper Road/Scaroni Road (cumulative)
- State Route 111 South/Jasper Road (cumulative)
- State Route 111 North/Jasper Road (cumulative)
- Jasper Road/Rockwood Avenue (cumulative)
- Cole Road/Scaroni Road (cumulative)

- Cole Road/Yourman (Rockwood) (cumulative)
- State Route-98/State Route-111 (cumulative)

Mitigation Measures to reduce these cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR. Table 72 summarizes the level of service results with mitigation in place for this scenario. As shown in Table 72 all intersections operate acceptably with the identified mitigation.

Year 2015 (With Total Project+Industrial Project) Caltrans (ILV) Intersection Operation

Caltrans intersection operation methodology on SR-111 interchange locations is summarized on Table 68. As shown on Table 68, with addition of the Total Project+Industrial Project traffic, the following intersections would have a significant impact for Year 2015:

- State Route-111 Northbound/Jasper Road (greater than 1,500 conflicting vehicles)
- State Route-111/State Route-98 - (greater than 1,500 conflicting vehicles)

Mitigation Measures to reduce these cumulative impacts to this alternative to a level less than significant are provided in Technical Appendices - Volume II of II, Appendix B of the EIR.

8.4.3.4 Year 2035 Roadway Network

For the year 2035 daily traffic analysis, all base assumptions are the same as described above for the "proposed project" scenario.

Year 2035 Roadway Segments (With Industrial Project)

The roadway segments were analyzed under Year 2035 conditions with and without this alternative. The roadway segments daily levels of service are summarized in Table 69. As shown in Table 69, all roadway segments operate efficiently with General Plan Circulation Element improvements. However, The project is required to participate in fair-share contributions to roadway and intersection improvements based on their traffic volumes (fair share is calculated in subsequent sections) to construct off-site circulation element needs.

The Jasper Road corridor also requires a six-lane configuration from Dogwood to east of Bowker Road. The project will be required to participate in this ultimate mitigation based on their fair share.

Additionally, with construction of Sunset Road south to Cole Road, the project is responsible for their fair share of necessary improvements including potential bridge widening on Sunset, as well as the Scaroni Road crossing.

Year 2035 (With Industrial Project) Intersection Operation

No impact to Intersection operation for the Year 2035 condition with the Industrial Development Alternative was identified. Therefore, a less than significant impact is identified for this issue area.

Year 2035 (With Industrial Project) Caltrans (ILV) Intersection Operation

No impact to Caltrans intersection operation is identified with the Industrial Development Alternative during the Year 2035 conditions.

8.4.3.5 *Industrial Development Project Access*

The project proposes three driveway access points on Jasper Road west of SR-111 which will also occur with the Industrial Development Alternative. The realignment of Scaroni Avenue to the west will form the most easterly access to the project. A second major access on Jasper Road is proposed west of the Scaroni Avenue alignment and is currently labeled "Sunset" on the project site plan. The third driveway to Jasper is located west of the future Sunset Road and is labeled Street "A" on the current site plan.

The project access at the realignment of Scaroni Avenue at Jasper Road is analyzed in the above impact sections for all project conditions. This intersection requires a traffic signal, with dual northbound left turn lanes, dual northbound right turn lanes, dual westbound left lanes and an exclusive eastbound right turn lane within Jasper Road (assuming Jasper Road with six through lanes).

Jasper Road/Street "A" - ultimately requires a traffic signal with a single egress lane and a westbound left turn lane.

Jasper Road/Sunset Road - assumes a traffic signal, two northbound lanes, dual westbound left lanes, an exclusive eastbound right turn lane within Jasper Road (as a 6-lane roadway).

Additionally, the project is required to construct Sunset Boulevard south to Cole Road, which will create an intersection, which ultimately requires a traffic signal, and an eastbound left turn lane.

8.4.3.6 *Industrial Development Access Operation*

Year 2015 Plus Total Project (Industrial Development) Access

Project access operation for the Year 2015 condition with Industrial Development Alternative traffic is shown on Table 70. The Jasper Road driveways operate effectively with traffic signal control with four lanes on Jasper. The intersection of Cole/Sunset also requires a traffic signal. Left turn lanes in Jasper and Cole Road are required with two egress lanes (project side) at all driveways).

8.4.3.7 *Summary*

Development of this alternative would occur during the final phases of the project and would not change the findings and conclusions of the proposed project for the existing plus casino, existing plus casino + phase 1, and year 2105 plus casino scenarios analyzed for the proposed project. As such, this alternative only impacts the year 2015 plus total project and year 2035 scenarios. This alternative demonstrates reduced traffic intensity and improved delay at most study area locations.

8.4.4 Air Quality

The proposed project would result in a short-term construction impact due to generation of fugitive dust, construction exhaust emissions, and ROGs above the ICAPCD's significance thresholds. The project would also result in a long-term air quality impact, but reduced, as a result of reduced vehicular generated emissions. Implementation of Mitigation Measures AQ1 and AQ2 and compliance with ICPACD Regulation VIII, would reduce the short-term construction related air quality impact to a level less than significant, except for ROG emissions which is considered to be a significant and unmitigable impact. Implementation of Mitigation Measures AQ3 and AQ4 would reduce the project's long-term operational air quality impact, as a result of vehicular generated emissions, to a less than significant impact. Implementation of Mitigation Measure AQ5 would reduce the project's odor/air toxin impact related to the Heber Geothermal Plant to a level less than significant.

In addition, the implementation of the proposed project will result in a significant impact to GHG emissions. With the implementation of Mitigation Measure AQ6, the impact to related to GHG emissions would be reduced to the extent feasible; however, a cumulatively significant and unmitigable impact would remain.

Information contained in this section is summarized from the *Air Quality Impact Analysis, 111 Calexico Place Project, Industrial Density Alternative, Calexico California*, prepared by Giroux and Associates Environmental Consultants (September 2, 2008). The air quality study is provided in Technical Appendices - Volume II of II, Appendix C3 of this EIR. All tables and figures referenced in this section are included in Technical Appendices - Volume II of II, Appendix C3 of this EIR.

8.4.4.1 Construction Impacts (Short-Term)

A comparison of Table 4.4-7 in the EIR, which identifies the proposed project's pollutant emissions and Table 4 in Technical Appendices - Volume II of II, Appendix C2 in the EIR was conducted to identify the change in pollutant emissions between the proposed project and this alternative.

During grading activities for the office/industrial components of the alternative, this alternative would emit similar levels of pollutant emissions. During the construction, painting, and paving activities, the alternative would emit more ROG, NOx, CO, total PM10, total PM2.5, and substantially more CO2. The proposed project would emit 7,229.9 pounds/day of CO2 and the alternative would emit 12,901.4-pounds/per day. The alternative would emit 5,671.5-pounds/per day more of CO2 during construction, painting, and paving construction activities.

During construction, the alternative neither eliminates a significant air quality impact nor does it result in a new air quality impact not already identified under the proposed project.

8.4.4.2 Operational Emissions

A comparison of Table 4.4-8 in the EIR, which identifies the proposed project's pollutant emissions and Table 5 in Technical Appendices - Volume II of II, Appendix C2 in the EIR was conducted to identify the change in pollutant emissions between the proposed project and this alternative. During operation of the casino, restaurant, and retail components of the project, the alternative would emit slightly less ROG, NOx, CO,

PM10, PM2.5, and CO2 than the proposed project. The alternative would emit one-tenth more SOx than the proposed project. However, the reduced emission levels generated by the alternative would not eliminate an exceedance of any pollutant emission thresholds of significance.

During operation of the total project with the office use component of the project, the alternative would emit less ROG, NOx, CO, SOx, PM10, PM2.5, and CO2 than the proposed project. However, the emission levels generated by the alternative would not eliminate an exceedance of any pollutant emission thresholds of significance.

Under the proposed project, less than significant impacts have been identified for the following issues: microscale impact (CO "Hotspots") and Odor/Air Toxins (e.g., geothermal power plant and greenhouse gas emissions (GHG). With the exception of the construction, painting, and paving activities in 2017 (short-term impacts), this alternative would emit less pollutant emissions that would have the potential to contribute to microscale impacts and odor/air toxins. In particular, in the long-term, the alternative would generate less traffic, resulting in less pollutant emissions that can contribute to exceedance of adopted Imperial County Air Pollution Control District (ICAPCD) operation significance thresholds, CO hotspots, and increases in GHG.

Implementation of Mitigation Measures AQ1 and AQ2 would reduce construction related impacts of this alternative, except ROG emissions, to a level less than significant. Implementation of Mitigation Measures AQ3 and AQ4 would reduce operational emissions to a level less than significant. Implementation of Mitigation Measure AQ5 would reduce GHG emissions, but such emissions would remain cumulatively significant.

8.4.5 Noise

Information contained in this section is summarized from the *Noise Impact Analysis, 111 Calexico Place Project, Industrial Density Alternative, Calexico California*, prepared by Giroux and Associates Environmental Consultants (September 3, 2008). The noise is provided in Technical Appendices - Volume II of II, Appendix D3 of this EIR. All tables and figures referenced in this section are included in Technical Appendices - Volume II of II, Appendix D3 of this EIR.

8.4.5.1 Project-Related Vehicular Noise

Under the proposed project, project-related traffic would increase noise levels by +3 dB or more at the existing timeframe on 12 segments in the project vicinity. However, by 2015 and 2035, this impact is diminished as the project contribution to traffic is diluted by area growth. The only segment that remains significant in 2035 is the Jasper Road segment between SR-111 and Scaroni Road, immediately adjacent to the project site. However, there are no proposed noise sensitive uses adjacent to this segment. As such, project related vehicular noise impacts are considered less than significant. Under this alternative, project-related traffic would increase noise levels by +3 dB or more at 12 segments (See Table 1, Technical Appendices - Volume II of II, Appendix D2). However, as with the proposed project, the only segment that remains significant in 2035 is the Jasper Road segment between SR-111 and Scaroni Road, immediately adjacent to the project site. As such, project related vehicular noise impacts are considered less than

significant. Implementation of this alternative would result in a similar noise impact. The issue is considered a less than significant impact.

8.4.5.2 *Project Exterior Noise*

As with the proposed project, under this alternative a significant impact would occur if outdoor uses were proposed within 80 feet of the Scaroni Road centerline. In addition, as with the proposed project, under this alternative a significant impact would occur if outdoor uses associated with the restaurant and retail uses are sited adjacent to SR-111. Implementation of this alternative would result in a similar noise impact, requiring implementation of Mitigation Measures N1 and N2 identified for the proposed project. In addition, proposed hotel rooms with common party walls may experience significant noise levels under both the proposed project and Industrial Development Alternative. Mitigation Measure N3 will reduce such impacts to below a level of significance.

8.4.6 Biological Resources

It is conservative to assume that the majority of the project site would be proposed for development. Therefore, it is anticipated that impacts to biological resources would be similar to the proposed project.

The proposed project would result in significant direct and indirect impacts to three sensitive avian species; 1) western burrowing owl, 2) yellow warbler, and 3) mountain plover. Direct impacts would be caused by clearing of suitable habitat for the burrowing owl. Indirect impacts to off-site western burrowing owls would be caused by increased light, traffic and noise associated with implementation of the proposed project. Direct impacts to the yellow warbler and mountain plover would include activities that result in take as defined b the Migratory Bird Treaty Act (most likely any vegetation removal and grading during breeding season). Implementation of Mitigation Measures B1 through B5 would reduce the significant impacts to a level less than significant.

Similar impacts would occur under the Industrial Development Alternative. Implementation of Mitigation Measures B1 through B5 would reduce the significant impacts to a level less than significant

8.4.7 Cultural Resources

Implementation of the proposed project would result in potentially significant impacts to cultural and paleontological resources because excavation for utilities and buildings would be required. Under the Industrial Development Alternative, similar excavation would be required, potentially resulting in similarly significant impacts to cultural and paleontological resources. Implementation of Mitigation Measure CR1 and CR2 required for the proposed project would mitigate cultural and paleontological resource impacts associated with the Industrial Development Alternative.

8.4.8 Hydrology and Water Quality

The proposed project would result in a violation of water quality standards in local surface waters through sedimentation/siltation and discharges from construction related activities. In addition, the proposed project would result in an increased amount of impervious surfaces on the project site, which creates the potential for runoff during a storm event to transport pollutants to local surface waters. The proposed

project would result in a significant long-term impact to surface water quality. Mitigation Measure HWQ1 will reduce these water quality impacts to a level less than significant.

It is anticipated that short-term and long-term water quality impacts under the Industrial Development Alternative would be similar to the proposed project. Mitigation Measure HWQ1 would also reduce impacts of the Industrial Development Alternative to a level less than significant.

8.4.9 Hazardous Materials/Public Safety

The proposed project would result in significant impacts to: soil contamination related to historic agricultural use of the project site; dewatering due to high potentially contaminated groundwater on the project site; and public safety related to the use and transport of chlorine by the Heber Geothermal Power Plant. Development of the project site under the Industrial Development Alternative would result in a similarly significant impact to hazardous materials and public safety because of the potential for dewatering of contaminated groundwater and a potential release of chlorine associated with the HGC plant. Both the proposed project and development under this alternative would be required to implement Mitigation Measures HM1 and HM2 to reduce potential impacts related to dewatering and chlorine to below a level of significance.

8.4.10 Public Services

Implementation of the proposed project would result in significant impacts to police and fire services, schools, and administrative services. Implementation of Mitigation Measures PS1, PS2, and PS3 would reduce impacts to public services to below a level of significance.

Implementation of the Industrial Development Alternative has the potential to result in a similar level of project-related impacts to public services as the proposed project. Under this alternative, there would still be money paid from the MOU between the Tribe and City. Payment of fees identified would reduce significant impacts of the Industrial Development Alternative to below a level of significance.

8.4.11 Utilities and Service Systems

The proposed project would result in a significant impact to water and wastewater services. However, with the implementation of Mitigation Measures PU1, and PU2 and construction of the appropriate infrastructure needed to service the project, this impact would be reduced to a level less than significant.

The proposed project would result in a significant impact to electricity services. The proposed project would result in an increase of electrical consumption and would require the construction of a new substation to service the project site. Implementation of Mitigation Measure PU3 will reduce this impact to a level less than significant.

It is anticipated that development under the Industrial Development Alternative would also result in the need for additional water service, wastewater service, and electricity, including, but not limited to the construction of new infrastructure. The potential impact to utilities under this alternative is expected to be significant, similar to the impacts of the proposed project. The utilities and service systems mitigation

measures required of the proposed project, PU1, PU2, and PU3, would also be required of the Industrial Development Alternative. Implementation of mitigation measures PU1, PU2 and PU3 would reduce utilities and service systems impacts of this alternative to a level less than significant.

8.4.12 Geology/Soils

The proposed project would result in significant impacts related to liquefaction, unstable soils, expansive soils, and soil erosion. Implementation of Mitigation Measure GS1 will reduce this impact to a level less than significant. Development of structures under the Industrial Development Alternative would have a similar potential to result in impacts related to liquefaction, unstable soils, expansive soils, and soil erosion. Implementation of Mitigation Measure GS1 will reduce the geology/soils impact of this alternative to a level less than significant.

8.4.13 Summary of Impacts

This alternative is considered environmentally similar to the proposed project, as it would result in similar impacts related to land use, air quality, noise, cultural resources, biological resources, hydrology and water quality, hazardous materials/public safety, utilities and service systems, and geology/soils.

Traffic Summary: Development of this alternative affects the final phases of the project and would not change the findings and conclusions of the proposed project for the existing plus casino, existing plus casino + phase 1, and year 2105 plus casino scenarios analyzed for the proposed project. As such, this alternative only changes the year 2015 plus total project and year 2035 scenarios. This alternative demonstrates reduced traffic intensity and improved intersection operation at most study area locations over the proposed project. Implementation of this alternative would result in less ADT's and an associated reduction in carbon monoxide.